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Attorneys for Defendants  
WARNER BROS. TELEVISION, a division of  
WB STUDIO ENTERPRISES INC., FOX  
BROADCASTING COMPANY, GREG  
BERLANTI, BCR & CO. dba BERLANTI  
PRODUCTIONS, CHRIS FEDAK, VHPT! CO.,  
SAM SKLAVER, SKLAVERWORTH INC., and  
SARAH SCHACTER

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

BARRY LYGA, an individual,  
Plaintiff,  
vs.

Case No. 2:22-cv-06814-FLA-AGR

**STIPULATION REGARDING  
SECOND AMENDED COMPLAINT  
AND RESPONSE TO SAME**

WARNER BROS. TELEVISION, a division of WB STUDIO ENTERPRISES INC., a Delaware corporation; FOX BROADCASTING COMPANY, a Delaware corporation; GREG BERLANTI, an individual; BCR & CO. dba BERLANTI PRODUCTIONS, a California corporation; CHRIS FEDAK, an individual; VHPT! CO., a California corporation; SAM SKLAVER, an individual; SKLAVERWORTH INC., a California corporation; SARAH SCHECTER, an individual; and DOES 1 through 100, inclusive,

## Defendants.

1 | **TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:**

2 | This stipulation is entered by and between plaintiff Barry Lyga (“Plaintiff”)  
3 | and defendants Warner Bros. Television, a division of WB Studio Enterprises Inc.,  
4 | Fox Broadcasting Company, Greg Berlanti, BCR & Co., Chris Fedak, VHPT! Co.,  
5 | Sam Sklaver, Sklaverworth Inc., and Sarah Schecter (“Defendants”) (collectively  
6 | with Plaintiff, the “Parties”), with reference to the following facts:

7 | 1. Plaintiff filed his First Amended Complaint on March 23, 2023 (Dkt.  
8 | 35), with Defendants’ response currently due by May 22, 2023 (Dkt. 34).

9 | 2. On May 12, 2023, counsel for Plaintiff met and conferred with counsel  
10 | for Defendants pursuant to Local Rule 7-3 regarding Defendants’ anticipated  
11 | motion to dismiss the First Amended Complaint.

12 | 3. The Parties agreed that Plaintiff will prepare a proposed Second  
13 | Amended Complaint by June 21, 2023 in an attempt to address the concerns  
14 | identified by Defendants’ counsel at their meet and confer.

15 | 4. Plaintiff intends to provide Defendants with a copy of this proposed  
16 | Second Amended Complaint so that Defendants may determine whether they will  
17 | (1) move forward with a motion to dismiss the First Amended Complaint, or (2)  
18 | consent to Plaintiff’s filing of the proposed Second Amended Complaint.

19 | NOW THEREFORE, and subject to the Court’s approval, the Parties  
20 | STIPULATE and AGREE that:

21 | (a) Plaintiff shall have until June 21, 2023 to prepare and provide  
22 | Defendants with a proposed Second Amended Complaint;

23 | (b) Defendants shall review the proposed Second Amended Complaint by  
24 | June 28, 2023, and inform Plaintiff’s counsel whether Defendants will consent to its  
25 | filing;

26 | (c) If, upon Defendants’ review of the proposed Second Amended  
27 | Complaint, Defendants consent to its filing, (i) Plaintiff will file and serve his

1 Second Amended Complaint by July 12, 2023, and (ii) Defendants will have until  
2 August 11, 2023 to respond to the Second Amended Complaint.

3 (d) If, upon review of the proposed Second Amended Complaint,  
4 Defendants do not consent to Plaintiff's filing of the proposed Second Amended  
5 Complaint, Defendants will have until July 21, 2023 to respond to the First  
6 Amended Complaint.

7 (e) Given Plaintiff's plans to provide Defendants with a proposed Second  
8 Amended Complaint, Defendants need not file their responses to the First Amended  
9 Complaint by May 22, 2023.

10 (f) This Stipulation does not waive any Defendants' right to file a motion  
11 to dismiss the First Amended Complaint or any subsequently amended complaints.  
12

13 DATED: May 18, 2023

DAVIS WRIGHT TREMAINE LLP  
NICOLAS A. JAMPOL  
ADRIAN F. VALLENS

15 By: /s/ Nicolas A. Jampol  
16 Nicolas A. Jampol

17 Attorneys for Defendants  
18 WARNER BROS. TELEVISION, a  
division of WB STUDIO  
19 ENTERPRISES INC., FOX  
BROADCASTING COMPANY, GREG  
20 BERLANTI, BCR & CO. dba  
BERLANTI PRODUCTIONS, CHRIS  
FEDAK, VHPT! CO., SAM  
SKLAVER, SKLAVERWORTH INC.,  
21 and SARAH SCHECTER  
22

23 DATED: May 18, 2023

LPL LAWYERS  
GI NAM LEE

24 By: /s/ Gi Nam Lee  
25 Gi Nam Lee

26 Attorney for Plaintiff  
27 BARRY LYGA  
28

## SIGNATURE ATTESTATION

Pursuant to L.R.5-4.3.4, I attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: May 18, 2023

/s/ *Nicolas A. Jampol*

Nicolas A. Jampol, Esq.